

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

NETLIST, INC.,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 2:21-cv-463-JRG
)	
SAMSUNG ELECTRONICS CO., LTD.,)	JURY TRIAL DEMANDED
SAMSUNG ELECTRONICS AMERICA,)	
INC., SAMSUNG SEMICONDUCTOR,)	
INC.,)	
Defendants.)	
)	

**DECLARATION OF JASON G. SHEASBY IN SUPPORT OF NETLIST'S
MOTION TO QUASH TRIAL SUBPOENAS ON CHUCK HONG AND
SCOTT MILTON**

I, Jason G. Sheasby, declare as follows:

1. I am an attorney at the law firm of Irell & Manella LLP, counsel of record for Plaintiff Netlist, Inc. (“Netlist”) in the above-captioned action. I am a member in good standing of the State Bar of California and have been admitted to practice *pro hac vice* before this Court in this action. I provide this declaration in support of Netlist’s Motion to Compel Production of Sales, Financials, and Marketing Documents Relating to Micron’s Accused Products and for Sanction. I have personal knowledge of the facts stated herein, and could and would testify completely thereto if called as a witness in this matter.

2. Attached as **Exhibit 1** is true and correct copy of email correspondence between counsel for Netlist and counsel for Samsung dated between May 8, 2023 and May 11, 2023.

3. Attached as **Exhibit 2** is a true and correct copy of Samsung’s Notice of Subpoenas to Scott Milton and Chun Ki Hong dated May 12, 2023.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 15, 2023, in Los Angeles, California.

By /s/ Jason G. Sheasby
Jason G. Sheasby